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January 14, 2016

**Plaintiff's Initial Disclosures***Via Facsimile:**Via U.S. Mail*

Jack S. Dawson

Amy L. Alden

MILLER DOLLARHIDE

210 Park Avenue, Suite 2550

Oklahoma City, OK 73102

*RE: Randy Blake Patterson v. National Board of Medical Examiners  
United States District Court, Western District Case No. CIV-15-1204*

Dear Counsel:

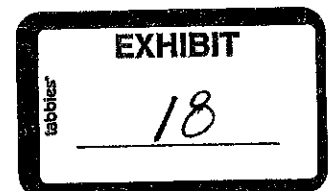
On behalf of Plaintiff, Randy Blake Patterson and pursuant to Rule 26(a)(1), please accept the following Initial Disclosures:

**I. Individuals Likely to Have Discoverable Information:**

1. Plaintiff, Randy Blake Patterson

Facts and circumstances surrounding the January 7, 2013 Step 2 (CS) exam in Los Angeles, CA and damages sustained by Plaintiff in his inability to complete Step 2 (CS) exam before July 1, 2013.

2. Representative of Defendant.  
(Unknown to Plaintiff at this time)



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| 3. Randy and Bonnie Patterson<br>Oklahoma City, OK | Parents of Plaintiff will testify as to facts and circumstances surrounding the January 7, 2013 Step 2 (CS) exam in Los Angeles, CA, and damages sustained by Plaintiff. |
| 4. Kevin Smith, DDS<br>Oklahoma City, OK           | Dr. Smith will testify as to his knowledge of the facts and circumstances and damages.   |
| 5. Economic loss expert witness.                   | Financial damages sustained by Plaintiff.  |
| 6. Credentialing expert witness.                   | Facts concerning the credentialing process and placement of medical school graduates.  |

**II. Documents and Tangible Things in Plaintiff's Possession:**

1. Application made by Plaintiff to take Step 2 (CS) examination.
2. Written notification made by Plaintiff of Incomplete Examination Record.
3. Incident Report dated March 22, 2013 from Defendant.
4. Telephone records made to Defendant (March and April, 2013)

**III. Computation of Damages.**

Plaintiff lost five (5) years of income as a residency-trained specialist, the cost of medical school tuition, interest on his loans, and the costs of re-training. A total calculation will be submitted. At this time Plaintiff believes these damages will be in excess of \$2,000,000.

Respectfully Submitted,

CLARK & MITCHELL, P.C.



Steven E. Clark

SEC/rjs